

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

RUBEN QUIROZ-TREJO, )  
                          )  
Petitioner,           )  
                          )  
v.                     ) CASE No.: 3:15-cv-1020  
                          )  
DAVID RIVERA,       ) SENIOR JUDGE WILLIAM J. HAYNES, JR.  
                          )  
Respondent.          )

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**PETITIONER'S MOTION FOR LEAVE TO FILE REPLY/TRAVERSE**

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Pursuant to M.D. TENN. L.R. 7.01(b) and 28 U.S.C. §§ 2243 and 2248, Petitioner respectfully requests leave to file a Reply/Traverse to the Return filed by Respondent (ECF No. 9) on today's date within fourteen (14) days, or no later than December 18, 2015.

As good cause for this Motion, Petitioner, through counsel, states that the Return constitutes the first affirmative legal justification offered to Petitioner for his detention without bond following his arrest by immigration officials in Wilson County, Tennessee. In the interest of fairness to the Petitioner and affording the Court a full opportunity to review the current state of the law governing his detention, he seeks to provide a response brief to the Government's legal justification for his no-bond detention.

Counsel for the Petitioner consulted with counsel for the Government, who indicated Respondent opposes this Motion.

Date: December 4, 2015

Respectfully submitted,

**R. ANDREW FREE, TN BPRN 30513**

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**CERTIFICATE OF SERVICE**

I certify that on today's date, I served a true and correct copy of the foregoing *Petitioner's Motion for Leave to File Reply/Traverse* on the following individuals via this Court's CM/ECF system:

Joseph D. Hardy, Jr  
Department of Justice-Office of Immigration Litigation  
PO Box 868  
Ben Franklin Station  
Washington, DC 20008

Dated: December 4, 2015

By: /s R. Andrew Free, TN BPRN 30513  
R. Andrew Free